

From: [Warr \(Kettler\), Kristie](#)
To: [Moore, Gary](#)
Cc: [Crawford, Beth](#); [Cobb, Derrick](#)
Subject: RE: FT1002 (TCLP Data)
Date: Monday, September 15, 2014 10:56:48 AM

Gary,

I'm sorry I missed your call. I'm looking at the report you attached. I see the TCLP regulatory limits that are exceeded in FT 1002.

I took at the totals for FT1002 in SDG 54039. The total concentration for 2,4-dinitrotoluene is 13 U ug/L. Hexachlorobenzene (total) is 16 U ug/L. Hopefully, since the totals are non-detect at levels well below the regulatory levels, that will address the issue.

I also have a call into the lab to ask them about the deviation between the total and TCLP concentrations.

I will be back in touch ASAP.

Kristie

From: Moore, Gary [mailto:Moore.Gary@epa.gov]
Sent: Sunday, September 14, 2014 10:43 AM
To: Warr (Kettler), Kristie
Cc: Crawford, Beth
Subject: CES: FT1002 (TCLP Data)

Kristie:

Reviewing this data made me look at the detection limits associated with FT1002. The rules read that "equal to or exceeding". The following chemicals had issues that I could tell:

2,4-Dinitrotoluene

Hexachlorobenzene

It would appear that I would have to call this waste a hazardous waste only because we could not determine if the waste was equal to or exceeds the Regulatory Level.

What is the resolution to this?

I am hoping there are not others like this.

Gary Moore

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